



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

December 22, 2005

Certified Mail No. 7004 1160 0005 8739 4885

Reggie Pederson
Unit Director
J.R. Simplot Company
P.O. Box 1059
Caldwell, ID 83606

RE: Facility ID No. 027-00009, J.R. Simplot, Caldwell Facility, Caldwell
Final Permit Letter

Dear Mr. Pederson:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct No. P-050016 to the J.R. Simplot Company for its Caldwell facility in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received April 4, 2005. This permit is effective immediately and replaces PTC No. 027-00009, issued on December 31, 1997, the terms and conditions of which no longer apply. This permit does not release the J.R. Simplot Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Please beware that this permit to construct conflicts with existing Tier I operating permit conditions and that you may operate the source so long as it does not violate terms or conditions of the existing Tier I operating permit. This permit will be incorporated into the Tier I operating permit renewal currently being processed by DEQ.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

J.R. Simplot, Caldwell Facility, Caldwell
Final Permit Letter, December 22, 2005
Page 2

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Martin Bauer, Administrator
Air Quality Division

MB/SYC/sd
Enclosures

Permit No. P-050016

G:\Air Quality\Stationary Source\SS Ltd\PTC\JR Simplot Caldwell\P-050016\Final\NP-050016 Final PL.doc

bc: June Hues, Boise Regional Office
Bill Rogers, Permit Coordinator
Shawnee Chen, Permit Writer
Almer Casile, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050016

FACILITY ID No.: 027-00009

AQCR: 64

CLASS: A

SIC: 2037

ZONE: 11

UTM COORDINATE (km): 521.5, 4835.0

1. PERMITTEE

J. R. Simplot Company, Food Group

2. PROJECT

PTC Revision – Line 1 Fryer

3. MAILING ADDRESS

P. O. Box 1059

CITY

Caldwell

STATE

ID

ZIP

83605

4. FACILITY CONTACT

Lance Carter

TITLE

Environmental Manager

TELEPHONE

(208) 454-4360

5. RESPONSIBLE OFFICIAL

Reggie Pederson

TITLE

Unit Director

TELEPHONE

(208) 454-4201

6. EXACT PLANT LOCATION

Two Miles West of Caldwell on Highway 19

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato processing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: December 22, 2005

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE	4
2. LINE 1 FRYER	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	7

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
O&M	operations and maintenance
PM	particulate matter
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound
WESP	wet electrostatic precipitator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050016

Permittee:	J. R. Simplot, Food Group	Facility ID No. 027-00009	Date Issued:	December 22, 2005
Location:	Caldwell, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 This permit to construct (PTC) revises the facility's existing permit with respect to the air pollution control equipment that controls emissions from the Line 1 fryer. The existing PTC contains operating, monitoring, and recordkeeping requirements for a wet scrubber. DEQ issued a Consent Order to the facility in 1999 which required the replacement of the wet scrubber with a wet electrostatic precipitator (WESP). The WESP was installed in 2000; however, the operating, monitoring, and recordkeeping requirements in the PTC were never revised to reflect the WESP. This permit revision updates the permit to reflect operating, monitoring, and recordkeeping requirements for the WESP. Emissions do not increase as a result of this permit revision.
- 1.2 This PTC replaces PTC No. 027-00009, issued on December 31, 1997, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Line 1 fryer	WESP

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050016

Permittee:	J. R. Simplot, Food Group	Facility ID No.	Date Issued:	December 22, 2005
Location:	Caldwell, Idaho	027-00009		

2. LINE 1 FRYER**2.1 Process Description**

Line 1 processes preformed potato products. It consists of one blancher, one dryer, and one fryer. The maximum rated capacity of the Line 1 fryer is 9,568 pounds of finished pre-formed potato product per hour.

2.2 Emissions Control Description

Particulate matter emissions from the Line 1 fryer are controlled by a WESP.

Table 2.1 LINE 1 FRYER DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Line 1 fryer	WESP	Line 1 fryer stack

Emissions Limits**2.3 Emissions Limits**

- The hourly PM emissions from the Line 1 fryer stack shall not exceed 10.88 pound per hour.
- The annual PM emissions from the Line 1 fryer stack shall not exceed 47.65 tons per year.

2.4 Opacity Limit

Emissions from the Line 1 fryer stack, or any other stack, vent, or functionally equivalent opening associated with the Line 1 fryer, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**2.5 Throughput Limits**

The maximum throughput of finished pre-formed potato product of the Line 1 fryer shall not exceed 41,908 tons per any consecutive 12-month period.

2.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications and recommendations, equipment to monitor the secondary voltage of the WESP and the quench water flow rate.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050016

Permittee:	J. R. Simplot, Food Group	Facility ID No.	Date Issued:	December 22, 2005
Location:	Caldwell, Idaho	027-00009		

2.7 Operations and Maintenance (O&M) Manual Requirements

The permittee shall have developed an O&M manual for the WESP that describes the procedures that will be followed to comply with General Provision 2 and the requirements for the WESP as contained in this permit. The O&M manual shall contain at a minimum, the following information: a general discussion of the operation of the WESP, operating procedures, normal operating ranges for the secondary voltage and the quench water flow rate, corrective action steps for when operation is not consistent with normal operating ranges, cleanup and maintenance procedures, and recordkeeping. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The permittee shall operate the WESP system in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements**2.8 Throughput Monitoring**

The permittee shall monitor and record the throughput to the Line 1 fryer monthly and annually to demonstrate compliance Permit Condition 2.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. Records of this information shall be kept on site for the most recent two year period and shall be made available to DEQ representatives upon request.

2.9 Operating Parameters

The permittee shall monitor and record the following operating parameters once per day while the WESP is operating. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request:

- The secondary voltage of the WESP
- The flow rate of the quench water system
- The quench water system shall be monitored and a daily record kept of whether the sprays are in operation and the corrective action taken when the sprays are not in operation

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050016

Permittee:	J. R. Simplot, Food Group	Facility ID No.	Date Issued:	December 22, 2005
Location:	Caldwell, Idaho	027-00009		

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050016

Permittee:	J. R. Simplot, Food Group	Facility ID No.	Date Issued:	December 22, 2005
Location:	Caldwell, Idaho	027-00009		

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.